UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA DURHAM DIVISION

HAYDEN SCOTT ROSE,

Civil Action No. 1:22-CV-478

Plaintiff,

v.

PRESQUE ISLE VILLAS
CONDOMINIUM HOMEOWNERS
ASSOCIATION, INC.; PRESQUE ISLE
VILLAS CONDOMINIUM
HOMEOWNERS ASSOCIATION, INC.,
BOARD OF DIRECTORS;
COMMUNITY ASSOCIATION
MANAGEMENT, Ltd.; and BAGWELL
HOLT SMITH, P.A.;

Defendants.

CONSENT MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

Defendant Bagwell Holt Smith, P.A., by and through undersigned counsel, respectfully states to the Court that additional time is needed for investigation and preparation of the Responsive Pleading or other response to the Complaint in the above case and respectfully moves the Court for an extension of time within which to serve the Responsive Pleading. The time has not expired for responding to the Complaint, and Plaintiff's counsel has consented to the extension. Accordingly, Defendant requests that the time for serving a Responsive Pleading or presenting other defenses in this action be extended up to and including August 12, 2022.

This the 27th day of July, 2022.

/s/Russell M. Racine Russell M. Racine NC Bar #33593 Robert El-Jaouhari NC Bar #49184

CRANFILL SUMNER LLP
2907 Providence Rd., Ste. 200
Charlotte, NC 28211
704 940-3418 – Tel.
704 831-5501 – Fax
rracine@cshlaw.com
www.cshlaw.com
Attorneys for Defendant Bagwell
Holt Smith, P.A.